


UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2019 OCT 24 PM 2:29

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UNITED STATES OF AMERICA

v.

JOHN KAYE,
Defendant.

No. 5:19-cr-147

INDICTMENT

The Grand Jury charges:

Count One

On or about October 16, 2019, in the District of Vermont, the defendant, JOHN KAYE knowingly and intentionally possessed with intent to distribute more than 500 grams of a substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1) & (b)(1)(B))

Count Two

On or about October 7, 2019, in the District of Vermont, the defendant, JOHN KAYE knowingly and intentionally distributed cocaine, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1) & (b)(1)(C))

Forfeiture Notice – No. One

1. The above allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841(a)(1), the defendant, JOHN KAYE, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the amount of United States currency used to facilitate the violation in Count One, in an amount of at least \$45,000, as well as United States currency in the amount of the gross proceeds obtained as a result of the violation in Count Two, in an amount of at least \$225.

3. If any forfeitable property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided

without difficulty, the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

(21 U.S.C. § 853)

A TRUE BILL



FOREPERSON

A stylized, handwritten signature in black ink.

CHRISTINA NOLAN
United States Attorney
Burlington, Vermont
October 24, 2019

A small, handwritten signature in black ink.

(MPD)